

01272 '99 APR 26 10:26

April 20, 1999

Dockets Management Branch
(HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Docket No. 98P-0504, Performance Standard for *Vibrio vulnificus*

Blount Seafood Corporation opposes the "nondetectable" performance standard that has been proposed by the Center for Science in the Public Interest. We feel that the Interstate Shellfish Sanitation Conference is maintaining proper controls of Vibrios and other pathogens through effective HACCP controls at packing plants and through proper consumer education. We feel that the proposed rule is unnecessary and could be devastating to the shellfish industry in general for the following reasons.

- The reliability of this new technology is uncertain and not established and would require start up costs that are estimated to be as high as a million dollars. This would increase manufacturing costs significantly and the higher cost for the consumer may create less demand in the marketplace for fresh oysters.
- Many of the few consumers who have tried the new treated oysters find that the oysters have inconsistent color and texture from the conventional raw oyster. If this treatment were mandatory for all oysters, this could also create less demand.
- Consumers might be confused by the difference between live and treated oysters, which could lead to mishandling problems. This would be dangerous for consumers, particularly those in high-risk groups.
- Difficulties are anticipated in ensuring the necessary refrigeration requirements for this process. Any non-conformance to cold temperature chain maintenance would be potentially deadly, particularly to high-risk individuals. These individuals have been informed to avoid raw shellfish but, with the new process, will probably begin to consume them.
- There is the potential that this technology may be required for all parts of the shellfish industry and be applied to all molluscan shellfish. A performance standard is not appropriate for other molluscan shellfish for it is illogical and inappropriate to establish a standard for species and products to which illness have never been attributed.

This new technology is offering the consumer a different choice to the conventional raw oyster. Many people do not like the taste of a treated oyster and many restaurants have rejected them, but some people tolerate them based on the promise pathogen-free product. It is important for people to be able to choose what they want for themselves and it is equally important for consumers to be properly educated of the risks associated with these choices.

Sincerely,

Michael J. Travers
Director of Quality Assurance

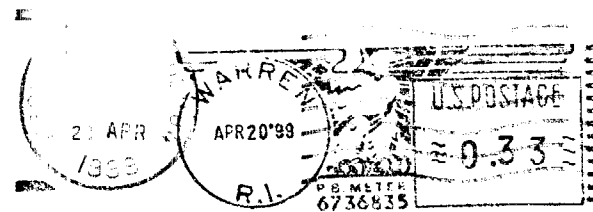
cc: Robert Collette, National Fisheries Institute.

98P-0504

C197



Blount Seafood Corp.
P.O. Box 327 • 383 Water Street
Warren, Rhode Island 02885



Dockets Management Branch
(HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

20852+0001

